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Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91195609
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	MARY L. KEVLIN COWAN, LIEBOWITZ & LATMAN, P.C. 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mel@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Robert Riether
Filer's e-mail	rar@cll.com, trademark@cll.com
Signature	/Robert Riether/
Date	01/28/2011
Attachments	1219468_1.pdf (3 pages)(12118 bytes)

Docket No. 21307.032 TRADEMARK

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

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In ra Application Social Nos. 77/212 002 and 77/212 012

MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the above-captioned proceeding for a period of six (6) months, until **July 28, 2011**.

Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made towards a resolution in this matter. Counsel for both parties have engaged in multiple discussions exploring various options to resolve the dispute. The additional time is requested for counsel for both parties to continue discussions and resolve any outstanding issues. Any potential agreement between the parties would resolve this matter without the need to proceed with the opposition proceedings.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six (6) months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial and other periods should be reset accordingly.

Dated: New York, New York

January 28, 2011

Respectfully submitted, COWAN, LIEBOWITZ & LATMAN, P.C. Attorneys for Opposer

By _____/Robert A. Riether/ Mary L. Kevlin Richard S. Mandel Maryann E. Licciardi Robert A. Riether

1133 Avenue of the Americas New York, New York 10036-6799 (212) 790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 28, 2011, I caused a true and complete copy of the foregoing *Motion On Consent To Continue Suspension of Proceedings And To Extend Discovery Period If Opposition Is Resumed* to be sent via First Class Mail, postage paid, to applicant's attorney, Mary J. Sotis, Esq., Frankfurt Kurnit Klein & Selz PC, 488 Madison Avenue, New York, New York 10022.

Dated: New York, New York January 28, 2011

/Robert A. Riether/
Robert A. Riether